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HALL *Communications, Inc.*

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October 5, 1995

OCT 23 1995

Chairman Reed E. Hundt
Federal Communications Commission
1919 M. Street N.W. Room 814
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In re: Establishment of Rules and Policies for the Digital Audio
Radio Satellite Service in the 2310-2360 Mhz Frequency Band, IB
Docket No. 95-91, GEN Docket No. 90-357.

Dear Chairman Hundt: DOCKET FILE COPY ORIGINAL

Hall Communications, Inc. submits as a reply comment in the above
captioned matter its strong support for the Comments previously
filed by Entertainment Communications, Inc., and the specific
proposal of Entercom for satellite DARS. A copy of Entercom's
comment summary is enclosed.

The current community based local broadcast system is already
under severe pressure in medium and smaller markets. The Entercom
proposal will serve the public interest by preserving what's left
of the local economic base for radio. However, the unrestricted
authorization of satellite DARS will inevitably erode and
eventually destroy local radio service in small markets.

Thank you for considering our views.

Sincerely,

Arthur J. Rowbotham
President

cc: Commissioner James H Quello
Commissioner Andrew C. Barrett
Commissioner Rachelle B. Chong
Commissioner Susan Ness

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BEFORE THE

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Federal Communications Commission OCT 23 1995

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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|--------------------------------|---|-----------------------|
| In the Matter of |) | IB Docket No. 95-91 |
| |) | GEN Docket No. 90-357 |
| Establishment of Rules and |) | RM No. 8610 |
| Policies for the Digital Audio |) | PP-24 |
| Radio Satellite Service in the |) | PP-86 |
| 2310-2360 Mhz Frequency Band |) | PP-87 |

To: The Commission

COMMENTS OF
ENTERTAINMENT COMMUNICATIONS, INC.

ENTERTAINMENT COMMUNICATIONS, INC.
100 Presidential Boulevard
Suite 10
Bala Cynwyd, Pennsylvania 19004

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SUMMARY OF POSITION

Entertainment Communications, Inc. ("Entercom") believes that the fragmentation of radio audience shares that would result from authorization of satellite DARS services in such manner as would permit competition in mainstream radio formats will undermine the economic base which supports the provision of local public service benefits by existing radio stations to the communities they serve. This will be especially so in smaller markets, where the magnitude of the increase in the number of available audio channels will be greatest and the economic base least supportive. The inevitable result of the unrestricted authorization of satellite DARS will be to erode and then eliminate the economic underpinning of local radio service in small markets through fragmentation of the available audience base, resulting first in the curtailment or elimination of news and public service programming and ultimately in the loss of all local radio service in small markets throughout the country.

The proponents of satellite DARS have stressed that the unique benefit of national satellite DARS service will be to allow radio service to be extended to audiences that are so geographically dispersed that they do not provide a sufficient audience base in an individual market but do so when aggregated as a national audience. The provision of service to such targeted unserved audiences is a desirable goal, so long as it can be achieved as a supplementary service which does not risk the elimination of the existing local service rendered by community-

based radio stations in small markets. To achieve the benefits of such supplementary programming, while preserving the benefits of the existing community-based broadcast system, the Commission should establish service rules for satellite DARS under which licenses will be granted only on a channel-by-channel basis to proposed services which address national audiences not being served by local radio stations.

The exceptional service rendered by radio stations in smaller markets will face insurmountable odds against survival from the implementation of satellite DARS unless the new service is restricted to serving those audiences and needs that are specifically identified as being unserved or underserved by local stations. DARS services can provide invaluable programming to foreign language or ethnic groups not now able to sustain their own local programming source, as well as to business or professional groups and those interested in specific subject matters. The Commission should require any satellite DARS applicant to demonstrate the public convenience and necessity for each channel, specify the nature and the scope of the programming to be offered, and document that the programming to be offered is not being provided to any significant degree by existing radio stations. Only in this fashion can the Commission ensure that the implementation of satellite DARS will provide new and unduplicated service to the public without undermining the crucial economic support for local, community-based public service broadcasting by existing radio stations.

OFFICE OF COMMISSIONER RACHELLE B. CHONG

Federal Communications Commission

1919 M Street, N.W., Room 844

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October 20, 1995

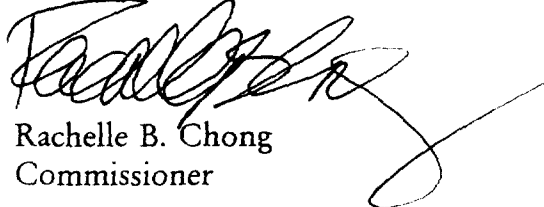
Arthur J. Rowbotham
President
Hall Communications, Inc.
404 W. Lime Street
P.O. Box 2038
Lakeland, FL 33806

RE: Satellite DARS

Dear Mr. Rowbotham:

Thank you for your letter of October 5, 1995 expressing your views on Satellite DARS. I will certainly take your letter into consideration when I make my final decision on the matter.

Sincerely,



Rachelle B. Chong
Commissioner

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